

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
JONESBORO DIVISION**

**TRI STATE ADVANCED SURGERY  
CENTER, LLC, GLENN A. CROSBY II, M.D.,  
F.A.C.S., and MICHAEL HOOD, M.D.,**

**Plaintiffs,**

**vs.**

**Civil Action No. 3:14-CV-00143-JM**

**HEALTH CHOICE, LLC, and  
CIGNA HEALTHCARE OF TENNESSEE, INC.,**

**Defendants.**

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**CONNECTICUT GENERAL LIFE INSURANCE  
COMPANY, CIGNA HEALTH AND LIFE  
INSURANCE COMPANY, and CIGNA  
HEALTHCARE OF TENNESSEE, INC.,**

**Counterclaim-Plaintiffs,**

**vs.**

**SURGICAL CENTER DEVELOPMENT, INC.  
d/b/a SURGCENTER DEVELOPMENT, and  
TRI STATE ADVANCED SURGERY CENTER, LLC,**

**Counterclaim-Defendants.**

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**TRI STATE ADVANCED SURGERY CENTER, LLC,**

**Counter-Counterclaim-Plaintiff,  
and**

**GLENN A. CROSBY, II, M.D. and  
MICHAEL HOOD, M.D.,**

**Third-Party Plaintiffs,**

**vs.**

**CIGNA HEALTHCARE OF TENNESSEE, INC.  
and HEALTH CHOICE, LLC,**

**Counter-Counterclaim and  
Third-Party Defendants.**

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**JOINT MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSE AND REPLY BRIEFS**

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COME NOW Tri State Advanced Surgery Center, LLC, Surgical Center Development, Inc., Dr. Glenn A. Crosby, II, and Dr. Michael Hood (collectively “Tri State Parties”); and Cigna Healthcare of Tennessee, Inc., Connecticut General Life Insurance Company, and Cigna Health and Life Insurance Company (collectively “Cigna Parties”), and file this Joint Motion for Extension of Time of the deadlines for filing response and reply briefs , respectively, concerning Cigna’s Motion to Dismiss Counter-Counterclaims filed on December 4, 2015 (DE # 123).

In support of this Motion, the Tri State Parties and Cigna Parties would respectfully show as follows:

1. The Cigna Parties filed a Motion to Dismiss Counter-Counterclaims of the Tri State Parties on December 4, 2015 (DE #123). Under the Local Rules of this Court, the Tri State Parties’ response is therefore due on or before December 21, 2015.

2. Given the number of issues raised and claims addressed in the Motion, as well as the upcoming holidays and previously-scheduled travel by counsel, the Tri State Parties respectfully request an extension of time through and including January 8, 2016, to file their response.

3. The Cigna Parties do not oppose the granting of the extension sought by the Tri State Parties.

4. In light of the above, the Cigna Parties also request an extension of their deadline for filing a reply to the Tri State Parties' response through and including January 29, 2016.

5. The Tri State Parties do not oppose the granting of the extension of time to file a reply brief requested by the Cigna Parties.

WHEREFORE, PREMISES CONSIDERED, the Tri State Parties and the Cigna Parties request that the Tri State Parties be granted an extension through and including January 8, 2016 within which to file their response to Cigna's Motion to Dismiss Counter-Counterclaims and that the Cigna Parties be granted through and including January 29, 2016 within which to file their reply to that response. In accordance with the Local Rules of this Court, a proposed order granting the relief requested is being submitted to the Court herewith.

Respectfully submitted,

/s/ Douglas F. Halijan

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**ATTORNEYS FOR PLAINTIFFS**

/s/ Warren Haskel

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**ATTORNEYS FOR CIGNA PARTIES**

**CERTIFICATE OF SERVICE**

I, Douglas F. Halijan, hereby certify that on this 10<sup>th</sup> day of December, 2015, I filed the foregoing with the Clerk of the Court and that the ECF system will send notification of filing to all counsel of record.

/s/ Douglas F. Halijan

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